

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

UNITED STATES OF AMERICA

§

V.

§

Cr. No. 7:20-cr-01676-1

JOSE LUIS TREJO

§

§

**DEFENDANT'S UNOPPOSED MOTION TO EXPEDITE SENTENCING**

JOSE LUIS TREJO, through his attorney, Alejandro Ballesteros, respectfully files this Motion to Expedite Sentencing for the following good faith reasons:

**I.**

The case is currently scheduled for Sentencing on Tuesday, September 27<sup>th</sup>, 2022, at 9:00am, before this honorable court. [DE 66].

**II.**

Undersigned counsel respectfully request that the Court move up the sentencing date of this Defendant. Defendant, Jose Trejo, has been eagerly awaiting resolution of this case since first indicted on October, 7 2020. [DE 1]. Mr. Trejo has worked hard to reach a just resolution in this case and for the benefit of himself and his family is fully prepared to move forward, accept responsibility for his actions, and receive his sentence early. Additionally, time is of the essence because Mr. Trejo is hoping to attend to business he has in Guadalajara and Leon from September 28<sup>th</sup> to October 5<sup>th</sup>. Depending on the sentence Mr. Trejo receives, he would like the opportunity to plan accordingly for the trip which is currently scheduled to commence the day after sentencing. In order to obviate a potential conflict, Mr. Trejo is respectfully requesting an earlier date for his sentencing hearing prior to the currently scheduled date of September 27<sup>th</sup>. Optimally, Defendant asks the court to consider September 9<sup>th</sup> 2022, as the date for sentencing.

**III.**

Counsel for the Government, AUSA Roberto Lopez , Jr., was consulted regarding this motion and he is unopposed to acceleration of the sentencing, waiving PSR deadlines.

**IV.**

WHEREFORE, for the reasons set forth above, Mr. Trejo, through his attorney, Alejandro Ballesteros, respectfully requests this honorable Court to advance the Sentencing hearing to an earlier date.

Respectfully submitted,

*/s/Alejandro Ballesteros*  
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**Certificate of Service**

On September 6, 2022, this unopposed motion was filed via ECF and served upon Assistant U.S. Attorney, Roberto Lopez , Jr.

*/s/Alejandro Ballesteros*  
Alejandro Ballesteros

**Certificate of Conference**

On September 6, 2022, Assistant U.S. Attorney for the McAllen Office of the Southern District of Texas, Mr. Roberto Lopez , Jr., was consulted and is not opposed to this motion.

*/s/Alejandro Ballesteros*  
Alejandro Ballesteros